

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

**CRYSTAL L. STAMOS,

DEBTOR.**

**CHAPTER 13

CASE NO. 23-33828-KRH**

OBJECTION TO CONFIRMATION OF AMENDED CHAPTER 13 PLAN

NOTICE

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WISH THE COURT TO SUSTAIN THE OBJECTION SOUGHT HEREIN, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE OBJECTION, THEN YOU MUST ATTEND THE HEARING ON THIS MATTER. OTHERWISE, THE COURT MAY DEEM OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED, AND ISSUE AN ORDER SUSTAINING THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

THE HEARING IS SCHEDULED TO BE HELD ON OCTOBER 2, 2024 AT 11:10 AM AT THE U.S. BANKRUPTCY COURT, 701 E. BROAD ST., RM 5000, RICHMOND, VA 23219.

COMES NOW, CB Rentals, LLC ("Lessor"), by Counsel, and objects to the confirmation of the Amended Chapter 13 Plan ("Plan") and in support thereof, represents unto the Court:

1. Lessor leased the Debtor a 10 x 16 Lofted Barn, pursuant to a valid Lease-Purchase Agreement and Disclosure Statement dated October 12, 2023.
2. The Amended Proof of Claim (Claim# 16-2) filed on August 1, 2024 by Lessor establishes a total debt of \$7,766.85 due as of November 3, 2023.
3. The Amended Plan does not contain any provisions for this Lessor. Therefore Lessor must object to the Plan as filed. Note that prior filed plan incorrectly placed this lease as a secured claim. Debtor will need to accept or reject this lease in section 7 of a proposed plan.
4. Any Chapter 13 Plan proposed by the Debtor must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this Lessor. It is respectfully requested that this Court deny confirmation of

the Plan.

WHEREFORE, the undersigned requests as follows:

1. That confirmation of the proposed Plan be denied;
2. Debtor be required to modify the Plan to honor the terms and conditions of Lease-Purchase Agreement; and
3. For such other relief as this Court deems proper.

CB Rentals, LLC

By: **/s/JOHNIE R. MUNCY**
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CERTIFICATE OF SERVICE

I certify that on August 22, 2024, the foregoing Objection was served via CM/ECF on Suzanne E. Wade, Trustee, and Jason Meyer Krumbein, Counsel for Debtor, at the email addresses registered with the Court, and that a true copy was mailed via first class mail, postage prepaid, to Crystal L. Stamos, Debtor, 12811 Captain Drive, Chester, VA 23836.

/s/JOHNIE R. MUNCY
Johnie R. Muncy, Esquire
Samuel I. White, P. C.